

Fabien Thayamballi

From: Burke, Dennis K. <BurkeD@ballardspahr.com>
Sent: Monday, April 23, 2018 11:09 PM
To: Neil L.Glazer
Subject: Clifton Park Storage Unit

Neil –

You stated earlier to me, "If you object to my client complying with the subpoena, I can stand aside and convey that to the EDNY."

We do object.

Your client is not the owner of the documents in question and has no authority to access, much less to review, these documents, some of which belong to ESF and others to Clare Bronfman. On behalf of both ESF and Ms. Bronfman, we are so notifying the U.S. Attorney's Office.

In the meantime, you and your client have no authority whatsoever to "index all containers, and then review the documents" as you told me you intend to do. Accordingly, you should take no steps to review these documents, some of which may include privileged information, including attorney-client communications.

Both ESF and Ms. Bronfman reserve all their legal rights and remedies and nothing herein may be construed to constitute waiver of any kind.